

IN THE COURT OF COMMON PLEAS OF LAWRENCE COUNTY, PENNSYLVANIA

ANNE PAPA,

Plaintiff,

v.

NESHANNOCK VFD, NESHANNOCK VFD  
BOARD, JOHN D. DICOLA, CHIEF AND  
INDIVIDUALLY, BRADLEY SHAFFER,  
DEPUTY AND INDIVIDUALLY, AND  
BRIAN MELCER, DEPUTY AND  
INDIVIDUALLY,

Defendants.

CIVIL DIVISION

10701 of 2020ca

**PRAECLYPE FOR RULE TO FILE  
COMPLAINT**

Filed on Behalf of Defendants,  
*Neshannock VFD, Neshannock VFD Board,*  
*John D. Dicola, Chief and individually,*  
*Bradley Shaffer, Deputy and individually, and*  
*Brian Melcer, Deputy and individually.*

Counsel of Record for This Party:

**Bruce E. Rende, Esquire**  
PA I.D.#52714

**Timothy D. Iannini, Esquire**  
PA I.D. #205572

**ROBB LEONARD MULVIHILL LLP**  
Firm #249  
BNY Mellon Center  
500 Grant Street, Suite 2300  
Pittsburgh, PA 15219

Telephone: (412) 281-5431  
Facsimile: (412) 281-3711

FILED/ORIGINAL

2020 OCT 30 AM 10:17

JODI KLABON-ESOLDO  
PRO ANN CLIFFORD

**JURY TRIAL DEMANDED**

IN THE COURT OF COMMON PLEAS OF LAWRENCE COUNTY, PENNSYLVANIA

ANNE PAPA,

Plaintiff,

v.

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BOARD, JOHN D. DICOLA, CHIEF AND  
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BRIAN MELCER, DEPUTY AND  
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Defendants.

CIVIL DIVISION

10701 of 2020ca

**PRAECIPE FOR RULE TO FILE COMPLAINT**

TO THE PROTHONOTARY:

Will you please issue a Rule upon the Plaintiff to file a Complaint in the within action  
within twenty (20) days from the date of service of the Rule or suffer a judgment of non-pros.

Respectfully submitted,

ROBB LEONARD MULVIHILL LLP

FILED/ORIGINAL

2020 OCT 30 AM 10: 17

JODI KLABON-ESOLDO  
PRO AND CLERK

By:

/s/Bruce E. Rende

Bruce E. Rende, Esquire

Attorneys for Defendants, Neshannock VFD,  
Neshannock VFD Board, John D. Dicola, Chief and  
individually, Bradley Shaffer, Deputy and  
individually, and Brian Melcer, Deputy and  
individually.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the within Praeclipe For Rule To File Complaint was served this 28<sup>th</sup> day of October, 2020 via First Class Mail, postage prepaid upon the following:

Angelo A. Papa, Esquire  
Signature Hill Legal  
318 Highland Avenue  
New Castle PA 16101

/s/Bruce E. Rende  
Bruce E. Rende, Esquire

FILED/ORIGINAL

2020 OCT 30 AM 10:17

JODI KLABON-ESOLDO  
PRO AND CI FRK

**ROBB LEONARD MULVIHILL**

ATTORNEYS AT LAW

October 28, 2020

Bruce E. Rende  
brende@rlmlawfirm.com  
Also admitted in WV & OH

Jodi Klabon-Esoldo  
Lawrence County Government Center  
Prothonotary Office  
430 Court Street  
New Castle, PA 16101

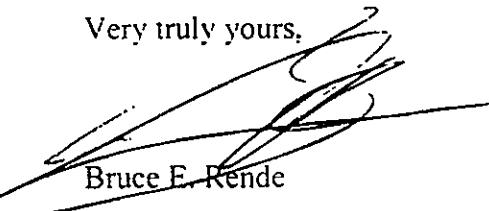
**RE: Anne Papa v. Neshannock VFD, Neshannock VFD Board, John D. Dicola,  
Chief and individually, Bradley Shaffer, Deputy and individually, and Brian  
Melcer, Deputy and individually.**  
Claim No: PATR20100579-00001  
Our File No: 26674BER

Dear Ms. Klabon-Esoldo:

Enclosed please find the Defendants' Praeclipe for Rule to File Complaint for filing in the above-referenced matter.

If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,



Bruce E. Rende

BER/evm  
Enclosures

cc: Angelo A. Papa, Esquire (w/o enclosures)

RECEIVED  
OCT 30 2020  
PRO & CLERK

(R1102757.1)